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ORIGINAL

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION

FILED
U.S. DISTRICT COURT
NORTHERN DIST. OF TX
FT. WORTH DIVISION

2015 JUL -2 AM 9:26

UNITED STATES OF AMERICA

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CLERK OF COURT

V.

CAUSE NO. 4:15-CR-152-A(05)

ANGELA CUPIT

DEFENDANT'S MOTION TO AMEND CONDITIONS OF PRETRIAL RELEASE

TO THE HONORABLE JOHN McBRYDE, UNITED STATES DISTRICT JUDGE:

Angela Cupit, through her counsel, hereby respectfully files this Motion to Amend Conditions of Pretrial Release, and, in support thereof, would respectfully show the Court as follows:

1. Defendant Cupit was released in this case on conditions of pretrial release by order dated June 19, 2015 [Doc 42].
2. Condition number 'g' of the pretrial release order mandated that she "avoid all contact, directly or indirectly, with any person who is or may be a victim or witness in the investigation or prosecution, including: co-defendants."
3. Defendant Cupit is married to James Gatlin, a co-defendant in this case, who is currently incarcerated in the Parker County Detention Center pending trial.
4. Defendant Cupit requests the Court to modify her conditions of release to allow her to visit her husband, James Gatlin, while he is incarcerated pending trial.
5. The undersigned attorney contacted Mr. Shawn Smith, the Assistant U. S. Attorney representing the Government in this case to determine whether he opposes this Motion to Modify.

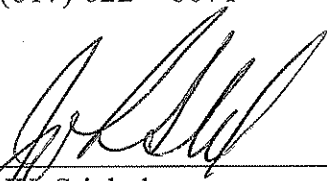
Mr. Smith stated that he does not oppose this Motion to Modify as long as Defendant Cupit and Defendant Gatlin do not discuss this case.

CONCLUSION

For all these reasons, Angela Cupit respectfully requests that this Honorable Court amend her conditions of pre-trial release to allow her to communicate with her husband, James Gatlin, while he is incarcerated pending trial.

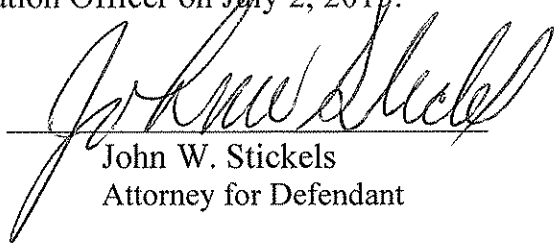
Respectfully submitted,

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BY: 
John W. Stickels
State Bar No. 19225300
Attorney for Angela Cupit

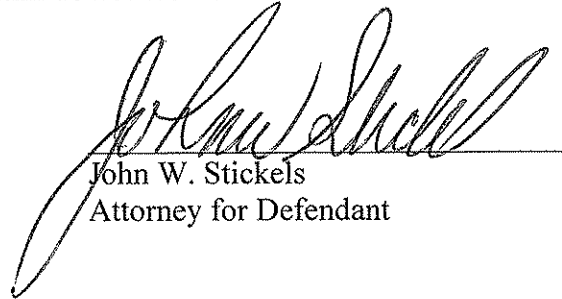
CERTIFICATE OF SERVICE

I certify that I served a copy of the foregoing Document on the Assistant United States Attorney Shawn Smith U. S. Probation Officer on July 2, 2015.


John W. Stickels
Attorney for Defendant

CERTIFICATE OF CONFERENCE

I hereby certify that on June 26, 2015, I conferred contacted Mr. Shawn Smith, the Assistant U. S. Attorney representing the Government in this case to determine whether he opposes this Motion to Modify. Mr. Smith stated that he does not oppose this Motion to Modify as long as Defendant Cupit and Defendant Gatlin do not discuss this case.



John W. Stickels
Attorney for Defendant